

Personal Care Products Council

Committed to Safety,
Quality & Innovation

March 5, 2014

Connecticut General Assembly
Committee on Children
Room 011, Capitol Building
Hartford, CT 06106

Re: Opposition to House Bill 5036 & House Bill 5354

Dear Committee Members:

The Personal Care Products Council (Council) respectfully submits this letter of opposition to the Connecticut General Assembly Committee on Children regarding House Bill 5036 and House Bill 5354, which concerns chemicals in children's products.

The Council is the leading national trade association representing the cosmetic and personal care products industry. The Council's more than 600 member companies manufacture, distribute, and supply the vast majority of finished personal care products marketed in the U.S. As the makers of a diverse range of products millions of consumers rely on every day, from sunscreens, toothpaste and shampoo to moisturizer, lipstick and fragrance, personal care products companies are global leaders committed to product safety, quality and innovation.

Consumers of cosmetics and personal care products are protected by federal safety regulations under the U.S. Food, Drug and Cosmetic Act (FD&C Act) and under the authority of the U.S. Food & Drug Administration (FDA). The FD&C Act makes it a federal crime to market an unsafe cosmetic product in the United States. Federal law states that cosmetic companies must substantiate the safety of their products prior to marketing; otherwise they must provide warning labels on the product. The law further provides FDA the authority to ban or restrict ingredients, enter and inspect manufacturing facilities, or seize adulterated or misbranded products.

Cosmetics companies work to ensure ingredient and product safety using the best science and latest available research to substantiate the safety of their products before they are marketed. The development of a new cosmetic or personal care product involves numerous scientific disciplines and multiple areas of expertise. Our companies employ and work with the world's leading scientific and medical experts and researchers to ensure product and ingredient safety.

Our member companies have led efforts that promote sustainable innovation while making meaningful improvements to the protection of human health and the environment. Our member companies routinely practice alternatives assessment as part of their research and development (R&D) process to develop new and improved products for consumers.

While the Council acknowledges the laudable intent of these bills, in current form they would have sweeping adverse ramifications for virtually all industry sectors that manufacture or sell a consumer product in Connecticut. It sets a poor precedent for addressing chemicals of potential concern in consumer products. This is particularly true given the bill's open-ended criteria for identifying priority chemicals and failure to include any consideration of risk.

Thank you for the opportunity to provide our position.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael F. Thompson". The signature is fluid and cursive, with the first name "Michael" being more prominent.

Michael F. Thompson
Senior Vice President, Government Affairs